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INTEGRATIVE THERAPEUTICS INC.™

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Wilsonville, OR 97070

P: 503.582.8386 ◊ F: 503.582.0467

ENZYMATIC THERAPY™

&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 ◊ F: 888.570.6460 (Enzymatic)

P: 920.469.9099 ◊ F: 920.469.4418 (Phyto)

January 10, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

JAN 14 2005

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Similase is a proprietary blend of vegetarian enzymes that are active across a broad pH range in the digestive tract.* It provides a higher potency and broader range of digestive enzymes than other products.* As a result of the higher potency and broader range of the digestive enzyme activity, Similase provides superior support of carbohydrate, protein, fat, and fiber digestion.*	Plant Enzymes: Protease I,II,III,IV, Amylase, Cellulase I,II, Lipase I,II, Phytase, Lactase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/10/05

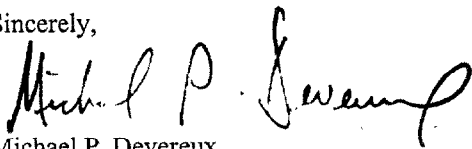
975 0162

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15402

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" and last name "Devereux" being more legible than the middle initial "P.". The signature is written over the printed name and title.

Michael P. Devereux
Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Similase contains four different proteases to enhance protein digestion in different pH ranges of the digestive tract.* The blend of the four proteases is active in a pH range of 2-10, meaning that this blend is enzymatically active in both the stomach and the intestine.* This range of enzyme activity enhances protein digestion throughout the digestion system.*	Plant Enzymes: Protease I,II,III,IV, Amylase, Cellulase I,II, Lipase I,II, Phytase, Lactase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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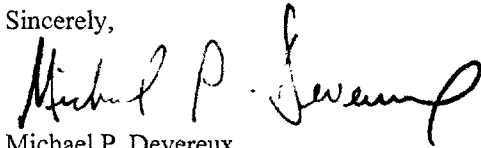
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Date 1/10/05

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Michael P. Devereux
Chief Financial Officer



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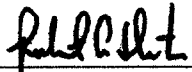
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Similase®	The amylase in Similase is active in a pH range of 4-6, which means that it is active in both the stomach and the intestine.* This range of enzyme activity enhances starch digestion throughout the digestion system.*	Amylase

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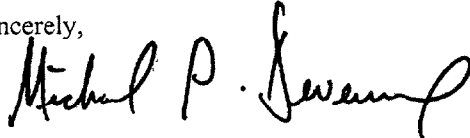
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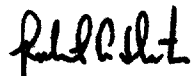
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Similase®	The cellulase in Similase is active in a pH range of 4-6, which means that it is active in both the stomach and the intestine.*	Cellulase

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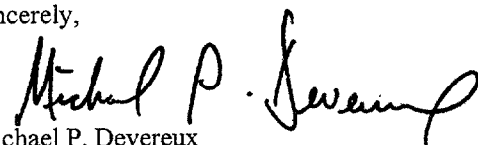
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Similase®	The phytase in Similase is active in a pH range of 5-7, which means that it's activity peaks in the intestine.*	Phytase

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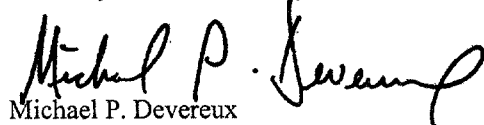
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 1/11/05

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Similase®	Similase contains three different sugar enzymes to enhance sugar digestion in different pH ranges of the digestive tract.* The blend of the three sugar enzymes is active in a pH range of 3-8, meaning that this blend is enzymatically active in both the stomach and the intestine.* This range of enzyme activity enhances sugar digestion throughout the digestion system.*	Lactase, Sucrase, Maltase

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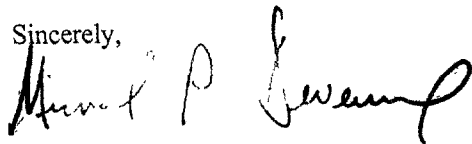
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Similase®	Similase contains two different lipases to enhance fat digestion in different pH ranges of the digestive tract.* The blend of the four lipases is active in a pH range of 4-8, meaning that this blend is enzymatically active primarily in the intestine where fat absorption occurs.*	Lipase

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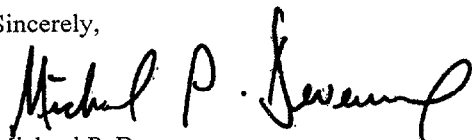
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Similase®	Since digestive enzymes act upon food by breaking it down into simpler components that can be used by the body for energy, digestive enzyme supplementation can be used to enhance the digestive process and ensure complete digestion of food.*	Plant Enzymes: Protease I,II,III,IV, Amylase, Cellulase I,II, Lipase I,II, Phytase, Lactase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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Similase®	Individuals with carbohydrate intolerance can greatly benefit from supplementing their diet with amylase, sucrase, maltase, and lactase.*	Plant Enzymes: Protease I,II,III,IV, Amylase, Cellulase I,II, Lipase I,II, Phytase, Lactase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

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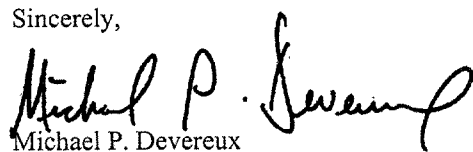
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Digestive enzyme supplementation using amylase, protease, and lipase enzymes can be used to relieve occasional constipation by improving the digestion of food and improving elimination.*	Plant Enzymes: Protease I,II,III,IV; Amylase, Cellulase I,II, Lipase I,II, Phytase, Lactase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

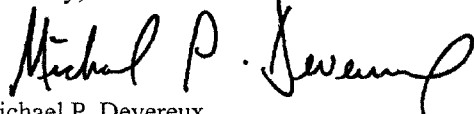
Title: Senior Vice President of Scientific Affairs

Date

1/12/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY INCORPORATED

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January 12, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Similase®	Supplementation with amylase, protease, lipase, cellulase, phytase, sucrase, maltase, and lactase enzymes will provide any missing or insufficient enzymes and alleviate gas symptoms associated with the digestion of food.*	Plant Enzymes: Protease I,II,III,IV, Amylase, Cellulase I,II, Lipase I,II, Phytase, Lactase I,II, Sucrase (Invertase), Maltase (Malt Diastase)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date _____

1/12/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux
Chief Financial Officer